

HON. JOHN C. COUGHENOUR

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

Wolfire Games, LLC, Sean Colvin, Susann Davis, Daniel Escobar, William Herbert, Ryan Lally, Hope Marchionda, Everett Stephens, individually and on behalf of all others similarly situated.

**Plaintiffs,**

V.

Valve Corporation,

Defendant.

Case No. 2:21-cv-00563-JCC

## **DECLARATION OF DAVID D. GOLDEN**

I, David D. Golden, submit this declaration on behalf of Constantine Cannon LLP and hereby state under penalty of perjury as follows:

1. I am a partner with the law firm Constantine Cannon LLP (“Constantine Cannon”), counsel for Plaintiffs in the above-captioned action. I joined Constantine Cannon in 2007.

2. I respectfully submit this declaration in support of the motion to appoint Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel”), Constantine Cannon, and Vorys, Sater, Seymour and Pease LLP (“Vorys Sater”) as Interim Co-Lead Class Counsel.

3. Constantine Cannon was retained by Wolfire Games, LLC (“Wolfire”) in March 2019 to investigate possible anticompetitive conduct by Valve Corporation (“Valve”) and its dominant platform for personal computer (“PC”) video games.

1       4. Over the next two years, Constantine Cannon conducted an extensive investigation  
2 into the PC video game industry. That investigation included (i) interviews with PC video game  
3 developers, publishers, storefront operators, and industry insiders; (ii) the review of thousands of  
4 documents related to Valve's conduct and business practices in the PC video game industry, and  
5 (iii) the analysis of pricing data for tens of thousands of video games sold by game publishers across  
6 a number of storefronts and platforms over multiple years.

7       5. Constantine Cannon attorneys expended more than 200 hours in the course of its  
8 investigation into Valve's conduct and business practices.

9       6.      The results of Constantine Cannon's investigation are reflected in the allegations in  
10 the Consolidated Amended Class Action Complaint.

I declare under penalty of perjury that the foregoing is true and correct.

13 || Executed this July 27, 2021 at Washington, District of Columbia.

/s/ David D. Golden  
David D. Golden

1                   **CERTIFICATE OF SERVICE**

2                   I hereby certify that on July 27, 2021, I caused a true and correct copy of the foregoing to be  
3 filed in this Court's CM/ECF system, which will send notification of such filing to counsel of record.  
4 I also caused a true and correct copy of the foregoing to be served on counsel for Dark Catt via email  
5 and first class mail to the addresses below:

6                   Service List:

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21                  Attorneys for,  
22                  Dark Catt Studios Holdings, Inc. and Dark Catt Studios Interactive LLC

23                  I declare under penalty of perjury under the laws of the State of Washington that the  
24 foregoing is true and correct.

25                  EXECUTED on this 27th day of July, 2021.

26                  \_\_\_\_\_  
27                  */s/ Alicia Cobb*  
Alicia Cobb, WSBA # 48685